

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978 (GBD)(SN)
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849 (GBD)(SN)
Kathleen Ashton, et al v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977 (GBD)(SN)
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923 (GBD)(SN)
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970 (GBD)(SN)
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065 (GBD)(SN)
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279 (GBD)(SN)

**NOTICE OF PLAINTIFFS' MOTION FOR SANCTIONS AGAINST
DEFENDANTS MUSLIM WORLD LEAGUE AND INTERNATIONAL ISLAMIC
RELIEF ORGANIZATION**

PLEASE TAKE NOTICE that upon the Declaration of Jerry S. Goldman, Esq. and the exhibits attached thereto, and the Memorandum of Law in Support of Plaintiffs' Motion for Sanctions Against Defendants Muslim World League and International Islamic Relief Organization, the plaintiffs by and through their undersigned counsel will move the Court before the Honorable Sarah Netburn, U.S. Magistrate Judge, at the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, Courtroom 219, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 37, sanctioning defendants Muslim World League and International Islamic Relief Organization for their defiance of this Court's prior orders compelling them to secure and produce documents responsive to plaintiffs' discovery requests,

and for their misrepresentations to the Court and plaintiffs concerning their possession of such responsive documents. As sanctions for this continuing misconduct, plaintiffs request that Muslim World League and International Islamic Relief Organization: (i) pay plaintiffs' reasonable attorneys' fees, costs and expenses (including the fees, costs and expenses related to this motion) incurred as a result of defendants' malfeasance and misconduct; (ii) remit to the Court a financial penalty for the judicial resources unnecessarily expended due to their misbehavior and to deter future actions in an amount determined by this Court; and (iii) receive such other and further sanctions that this Court deems just and proper. Plaintiffs seek this relief for the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Sanctions Against Defendants Muslim World League and International Islamic Relief Organization.

Dated: December 1, 2017

Respectfully Submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.
Kanishka Agarwala, Esq.
Bruce Strong, Esq.
Nicholas Maxwell, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 278-1000

Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1650 Market Street, Suite 2800
Philadelphia, PA 19103
Tel: (215) 665-2000

Jodi Westbrook Flowers, Esq.
Robert T. Haeefe, Esq.
MOTLEY RICE, LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
Tel: (843) 216-9000

James P. Kreindler, Esq.
Andrew J. Maloney, III, Esq.
KREINDLER & KREINDLER, LLP
750 Third Avenue, 32nd Floor
New York, NY 10017
Tel: (212) 687-8181

Attorneys for Plaintiffs